

### REMARKS

By way of the present response, claims 1, 9 and 18 are amended. Claims 1-18 currently are pending. In view of the above amendments and the remarks advanced below, reconsideration and withdrawal of the rejections of the claims is respectfully requested.

In response to the arguments presented on page 3 of Applicants' response of October 10, 2006, in which Applicants pointed out inaccuracies in the Examiner's statement:

“one of ordinary skill in the art would recognize that the polygons are stored in the z-buffer analogous to an occlusion culling data buffer from the statement in lines 51-53 of column 13: ‘... rendering polygons in the scene in depth order, starting with the closest polygon, and storing them in a Z-buffer...’,”

and also pointed out that to the contrary, a Z-buffer does not store polygons, but instead stores per-pixel depth-values for all pixels of the polygon, the Examiner asserts, at page 2, lines 18-20 of the Advisory Action, “However, the limitation of storing a complete polygon description is not recited in the rejected claim(s).” While Applicants believe the Examiner's logic and interpretations run contrary to the accepted meaning of a “Z-buffer” in the art, and that the claimed subject matter recites that it is the primitives that are stored in the occlusion data buffer, and bearing in mind that the art term “primitives” does not mean “pixels,” it should be clear that it is not the pixels that are stored in the occlusion data buffer. Furthermore, rasterization is the last operation in the claimed subject matter. Hence, there would not be suitable data available for Z-buffer. In any event, Applicants have amended independent claims 1 and 9 to make it abundantly clear that the occlusion data buffer stores a polygon description. For example, the background section of the present application describes primitives are typically triangles. Those of ordinary skill in the art would also instantly recognize that primitives also may include other kinds of polygons.

It is respectfully submitted, for reasons provided in Applicant's October 10, 2006, response, that neither of the applied Xie et al. and Fowler et al. patents teach, suggest or even hint at such a feature as now recited in the context of the other features of claims 1 and 9, whether these documents are considered individually or in any combination. Accordingly, the withdrawal of the rejections is believed warranted.

Based on the foregoing, this application is believed in condition for immediate allowance, and prompt notification of the same is earnestly sought. However, Applicants' representative believes a conference with the Examiner would be beneficial in expediting

the prosecution of this application, and hence such a conference is hereby requested. The undersigned will contact the Examiner shortly to arrange a personal interview.

Respectfully submitted,

/John F. Guay, Reg.# 47248/  
John F. Guay

Nixon Peabody LLP  
401 9<sup>th</sup> Street N.W.  
Suite 900  
Washington, D.C. 20004  
(202) 585-8298 (direct)